

**REMARKS**

Prior to this Amendment, claims 1, 2, 4, 6, 7, 10-14 and 17-20 were pending in this application. No claims have been amended, added, or canceled herein. Therefore, claims 1, 2, 4, 6, 7, 10-14 and 17-20 remain present for examination. Applicant respectfully requests reconsideration of these claims for at least the reasons presented below.

**35 U.S.C. § 103(a) Rejection, Frey Jr. in view of Novaes et al.**

The Office Action has rejected claims 1, 2, 6, 7, 10, 11, 13, 14, 17, 19 and 20 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,922,688 of Frey, Jr. (hereinafter "Frey") in view of U.S. Patent No. 6,925,490 of Novaes et al. (hereinafter "Novaes"). The Applicant respectfully submits that the Office Action does not establish a *prima facie* case of obviousness in rejecting these claims. Therefore, the Applicant requests reconsideration and withdrawal of the rejection.

In order to establish a *prima facie* case of obviousness, the Office Action must establish: 1) some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the references or combine their teachings; 2) a reasonable expectation of success of such a modification or combination; and 3) a teaching or suggestion in the cited prior art of each claimed limitation. See MPEP §706.02(j). However, the references cited by the Office Action do not teach or suggest each claimed limitation.

Frey "relates generally to computer system storage and more particularly to mechanisms (methods and devices) for providing distributed computer system storage." (Col. 1, lines 7-9) The method of Frey includes obtaining a referential map indicating a plurality of logical storage locations for a received reference and obtaining a physical map from one of the logical storage locations, the physical map indicating a physical storage location for the object associated with the logical storage unit from which the map was obtained. (Col. 2, lines 29-39)

However, as the Office Action states, Frey does not teach or suggest a preference list originating from the client computer. (Office Action, page 3, para. 2)

Novaes relates to a "method of controlling system traffic of a clustered computing environment." (Col. 1, lines 66-67) "The method includes . . . mapping one or more node addresses, for a service to be provided, to one or more network objects defined for the service; obtaining from the one or more network objects, one or more priorities of the service; and contacting the service based on the one or more priorities." (Col. 1, line 67 - col. 2, line 5) The portion of Novaes cited by the Office Action (Col. 22, line 35 - col. 23, line 30) provides a description of how such priorities are set and used.

Specifically, Novaes teaches, when reading an object, a network component "reads the priority value **stored in the service routing table of each network object** . . . (e.g., the System Registry)." (Col. 22, lines 48-50) "These values are **set by the system administrator**, according to his or her preferences for that system." (Col. 22, lines 50-52) The cited portion of Novaes then goes on to describe "further details relating to the manner in which a client of cluster services chooses a specific address for a service" with reference to FIG. 22. (Col. 22, lines 61-63) "Initially, the client retrieves a list of possible addresses where the service is present." (Col. 22, lines 64-65) The client looks up each node address in the node address definition data structure and performs operations to obtain the subnetwork address and name of each network to which the service addresses are mapped. (Col. 23, lines 5-17) "It then reads the service priority numbers from the service routing table, **which is stored in each network object**." (Col. 23, lines 17-20) "The client then orders the list of node addresses, according to the priorities, **which were set by the system administrator in the network objects**." (Col. 23, lines 20-22) "Thereafter, the client attempts to tact the service in order of the priorities." (Col. 23, lines 23-24)

That is, under Novaes, the client uses the priority information to find an object but, the priority information does not originate from the client. Rather the priority information is set by the system administrator in the service routing table of each object. See also Fig. 23

illustrating the service priority information 2310 as part of the service routing table 2312 of the network definition data 2308. Therefore, Novaes does not teach or suggest a preference list **originating from the client computer.**

Claim 1, upon which claims 2 and 6 depend, claim 7, upon which claims 10, 11, and 13 depend, and claim 14, upon which claims 17, 19, and 20 depend, each recite in part "a preference list originating from the client computer." Neither reference, alone or in combination, teaches or suggest a preference list originating from the client computer. Rather, Frey fails to teach or suggest a preference list of any kind while the priority list of Novaes is set by the system administrator in each network object for use by the client. For at least these reasons, claims 1, 2, 6, 7, 10, 11, 13, 14, 17, 19 and 20 should be allowed.

**35 U.S.C. 103(a) Rejections, Frey in view of Novaes and further in view of Prasad et al.**

The Office Action has rejected claims 4, 12 and 18 under 35 U.S.C. §103(a) as being unpatentable over Frey in view of Novaes and further in view of U. S. Patent No. 6,539,381 of Prasad et al. (hereinafter "Prasad"). The Applicant respectfully submits that the Office Action does not establish a *prima facie* case of obviousness in rejecting these claims. Therefore, the Applicant requests reconsideration and withdrawal of the rejection.

As discussed in detail above, the combination of Frey and Novaes fails to teach each limitation of the independent claims upon which claims 4, 12, and 18 depend. Specifically, neither Frey nor Novaes, alone or in combination, teaches or suggests a preference list originating from the client computer. Rather, Frey fails to teach or suggest a preference list of any kind while the priority list of Novaes is set by the system administrator in each network object for use by the client.

Prasad is directed to "synchronizing database information over a distributed communications network." (Col. 1, lines 9-10) Prasad "enables each server to track the state of each replica of a replica set." (Col. 3, lines 6-7) "Changes to the replicas are then communicated between the servers along with their states." (Col. 3, lines 7-8) "The states may be stored as an

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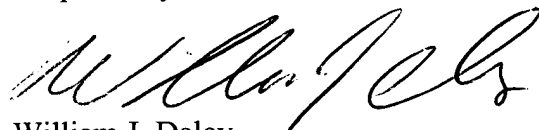
array of timestamps, each such timestamp indicating a time at which the replica on each server was last updated." (Col. 3, lines 9-11) Based on the time stamps, the replicas are updated and changes propagated through the network. (Col. 3, lines 25-65) However, Prasad does not teach or suggest, alone or in combination with any of the references, a preference list originating from the client or a directory that is affected by the preference list.

Therefore, the combination of Frey, Novaes, and Prasad is no more relevant to claims 4, 12, and 18 than any of the references alone since none of the references, alone or in combination, teach or suggest a preference list originating from the client computer as recited in independent claims 1, 7, and 14 upon which claims 4, 12, and 18 depend. For at least these reasons, claims 4, 12, and 18 should be allowed.

### CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

Respectfully submitted,



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